

07 CV 3854

William J. Honan (WJH 1922)
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JUDGE HOLWELL

ATTORNEYS FOR PLAINTIFF
DOLPHIN DRILLING LTD.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DOLPHIN DRILLING LTD.,

Plaintiff,

-against-

EQUATOR EXPLORATION LTD.,

Defendant.

07 Civ. _____ (____)

AFFIDAVIT IN
SUPPORT OF ATTACHMENT

STATE OF NEW YORK)
) ss:
COUNTY OF NEW YORK)

Christopher R. Nolan, being duly sworn, deposes and says:

1. I am associated with the firm of Holland & Knight LLP, attorneys for plaintiff Dolphin Drilling Ltd. ("Dolphin"), and I am duly admitted to practice before the United States District Court for the Southern District of New York.

2. I am familiar with the facts and circumstances underlying this dispute and I am submitting this affidavit in support of the Verified Complaint and the Writ of Attachment.

3. Defendant Equator Exploration Ltd. ("Equator") is not listed in the telephone directory of the principal metropolitan areas in this district, nor is it listed in the Transportation Tickler, a recognized commercial directory in the maritime industry.

4. To the best of my information and belief, Defendant Equator cannot be found within this district or within the State of New York.

5. Our office contacted the Secretary of State for the State of New York and was advised that Defendant Equator neither was a New York business entity, nor was it a foreign business entity authorized to do business in New York.

6. Based upon the facts set forth in the Verified Complaint, I respectfully submit that the Defendant Equator is liable to Plaintiff for the damages alleged in the Verified Complaint, which amounts, as best as can be presently determined, amount to a total of US\$68,902,173.00, including estimated interest, expenses and attorneys' fees.

7. Upon information and belief, Defendant Equator has property, goods, chattels or effects within this jurisdiction, to wit: funds or accounts held in the name of Equator Exploration Ltd. at one or more of the following financial institutions:

Bank of America, N.A.

The Bank of New York

Citibank, N.A.

Deutsche Bank Trust Company Americas

HSBC Bank USA, N.A.

JPMorgan Chase Bank, N.A.

UBS AG

Wachovia Bank, N.A.

Société Générale

Standard Chartered Bank

BNP Paribas

Calyon Investment Bank

American Express Bank

Commerzbank

ABN Amro Bank

Bank Leumi USA

Fortis Financial Groups

Banco Popular

Bank of Tokyo-Mitsubishi UFJ Ltd.

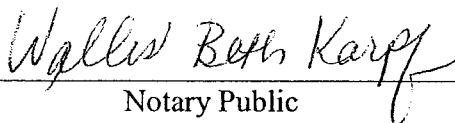
8. Plaintiff is, therefore, requesting that this Court, pursuant to Rule B(1) of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure, issue a writ of maritime attachment for an amount up to US\$68,902,173.00.

WHEREFORE, Plaintiff respectfully requests that the application for a writ of maritime attachment and garnishment be granted.



Christopher R. Nolan

Sworn to before me this
16th day of May, 2007



Notary Public

WALLIS BETH KARPf
Notary Public, State Of New York
No. 01KA6047092
Qualified In New York County
Commission Expires August 28, 2010

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